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To: Federal Communications Commission
Re: Docket No. 18-353

Zirkel Wireless supports WISPA's CBRS petition for waiver of transition deadline to January 8, 2023.

Founded in March of 2001, ZIRKEL Wireless is a locally owned and operated, Internet Service Provider. The ZIRKEL Network has the largest High-Speed Internet coverage area in Northwest Colorado and coverage continues to grow.

We deliver fast, reliable and affordable Internet service utilizing various fixed wireless technologies including 3.65GHz part 90 equipment. We provide service to several thousand clients with about a quarter of them receiving internet service via 3.65GHz part 90 equipment. Our dedicated local team is responsive to the needs of our subscribers and the community. Every year we preemptively increase our tower and network capacity to ensure we meet the speed and bandwidth demands of our customers.

We offer many affordable internet packages that range in price from \$46/mo. for 3Mbps to \$129/mo. for 30+Mbps with most clients opting for our Turbo plan at \$79/mo. for 15Mbps. We also offer dedicated links with up to 1Gbps speeds. Our network is a vital resource for NW Colorado because without our service most clients would be limited to dial up or satellite service, neither of which are adequate for: VoIP, teleconferencing, VPN, distance learning/online education, video streaming and much more. Lastly, ZIRKEL Wireless is a proud supporter of the NW Colorado community. Based on the belief that broadband internet should be accessible to everyone in the communities we serve, ZIRKEL Wireless offers free internet service for public WiFi to all libraries in our coverage area.

We support WISPA's CBRS Petition for waiver of transition deadline to January 8, 2023 because otherwise over a thousand of our clients will lose access to the internet on April 17, 2020 for the following reasons:

1. Currently only a few companies have received FCC certification for Part 96 fixed wireless equipment. The equipment we currently use to provide service under part 90 rules may or may not need to be replaced - we don't know because it has not been certified yet. If it needs to be replaced, that gives us only one summer build season (Colorado winters are not a viable time to deploy equipment on snow covered mountains) to purchase and deploy new equipment. This would be an extreme burden on our small company and would prevent us from spending capital and labor resources on other improvements and projects. The FCC originally planned on a five year transition but with the regulatory delays that have happened we would now only have one summer build season instead of five.
2. The Part 96 equipment requires a SAS database for operation. There are currently zero SAS databases certified by the FCC.
3. Part 96 operation requires a "Certified Professional Installer" CPI to register our equipment with the SAS. There are currently no classes, curriculum or exams available to obtain CPI status.
4. The FCC hasn't authorized GAA operations yet for the CBRS band.

Because of the above mentioned serious roadblocks to implementation, we respectfully ask the FCC to grant WISPA's petition for waiver to operate Part 90 devices until January 8, 2023.

Sincerely,

Sean Heskett

ZIRKEL Wireless